

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA.

CASE NO: 00-6309-~~CF~~-SEITZ

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

JULIUS BRUCE CHIUSANO,

Defendant.

MOTION FOR PERMISSION TO TRAVEL

COMES NOW, the Defendant, JULIUS BRUCE CHIUSANO, by and through undersigned counsel and pursuant to the Federal Rules of Criminal Procedure, and respectfully requests this Honorable Court enter an Order permitting the Defendant to leave the State of Florida and travel to Las Vegas, Nevada, and as grounds, would show unto the Court the following;

1. That the Defendant, JULIUS BRUCE CHIUSANO, is presently released on a one hundred thousand dollar corporate surety bond with supervised release.
2. That the Defendant is also released on bond on a one hundred thousand dollar corporate surety bond in Case No. 00-6273-Cr-Huck.
3. That the Defendant has been on supervised release since October 5, 2000.
4. That the Defendant respectfully requests this Honorable Court permit the Defendant to travel to Las Vegas, Nevada, for the purpose of a weekend holiday.
5. That the Defendant desires to travel outside of the State of Florida for approximately Four (4) days beginning on or about March 22, 2001 and returning March 25, 2001.
6. That a copy of the Defendant's Itinerary is attached hereto as Defendant's Exhibit 1.
7. That undersigned has spoken to the Pretrial Services officer, Raul Sagaro, regarding this travel permit and he has no objection.
8. That prior to the Defendant's departure the Defendant will provide addresses and

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Handwritten number '381' and a signature.

telephone numbers where he will be staying to Raul Sagaro of the Pretrial Services Office in Dade County, Florida, as required under Defendant's terms and conditions of supervised release and report immediately upon his return to the jurisdiction.

WHEREFORE, by reason of the foregoing, the Defendant, JULIUS BRUCE CHIUSANO, respectfully requests this Honorable Court enter an Order granting the Defendant's request permitting the Defendant to travel outside the State of Florida to Las Vegas, Nevada.

10-G CERTIFICATE

That undersigned counsel, pursuant to Local Rule 10(G)(1) certifies that he has contacted the opposing counsel, Assistant United States Attorney, Diane Fernandez, of the Southern District of Florida in an effort of good faith to resolve by agreement the subject matter and he states that he has no objection to the granting of this motion.

I HEREBY CERTIFY that a copy of the foregoing has been furnished to Diane Fernandez, Assistant United States Attorney, United States Attorney's Office, 299 East Broward Boulevard, Fort Lauderdale, FL 33301, by Facsimile (954-356-7230) and Raul Sagaro, Pretrial Services, 330 Biscayne Blvd., Suite 500, Miami, FL 33132, by Facsimile 305-530-7123, and by U.S. Mail, and the original hereof filed with the Clerk of the Court, by Hand Delivery, this 15th MARCH, 2001.

Respectfully submitted,

DONALD R. SPADARO, P.A.
Attorneys for DEFENDANT/CHIUSANO
1000 South Federal Highway
Suite 103
Fort Lauderdale, Florida 33316
Telephone: (954) 763-5504

By: 

DONALD R. SPADARO, ESQUIRE
Florida Bar No.: 320341

LIBERTY TRAVEL

Loehmann's Fashion Island Mall
18797 Biscayne Boulevard
Aventura, Florida 33180
Telephone (305) 705-0185 Fax (305) 705-0965
Email: mazena@libertytravel.com

To: Brenda

From: Audra Mazen

Re: Chiusano

Dt: 3/13/01

No of Pages: 1

Brenda,

Attached please find a copy of a flight itinerary for Bruce Chiusano. He is staying at Bally's Hotel in Las Vegas.

Thank you.

Audra

ITINERARY ONLY: NOT VALID FOR TRANSPORTATION
CHIUSANO/BRUCE PAGE 1 OF 1 FILE#

THIS ITINERARY IS FOR INFORMATION ONLY. Airfares are NOT guaranteed UNTIL ticketed. Seat assignments are subject to availability. Reconfirm reservations 72hrs prior to each flight.

NATIONAL AIRLINES	FLIGHT 88 22MAR THU	
DEPART 0805A	MIAMI INTERNL	CHECK-IN REQUIRED
ARRIVE 1025A	LAS VEGAS	
NATIONAL AIRLINES	FLIGHT 973 25MAR SUN	
DEPART 1250P	LAS VEGAS	CHECK-IN REQUIRED
ARRIVE 0820P	MIAMI INTERNL	